



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

via Federal Express

February 4, 2008

Phyllis E. Johnson  
Director  
Beltsville Agricultural Research Service  
United States Department of Agriculture  
10300 Baltimore Boulevard  
BLDG. 003, RM. 223, BARC-WEST  
Beltsville MD 20705

Re: Show Cause Letter

Dear Director Johnson:

This letter is a follow-up to the February 28, March 2 and March 21, 2007 inspections of the Beltsville Agricultural Research Service ("BARC") facility, located at 10300 Baltimore Avenue, Beltsville, Maryland (the "Facility") by inspectors from the U.S. Environmental Protection Agency ("EPA") together with BARC's response to EPA information requests to determine compliance with the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §§ 6901 *et seq.* and §§ 6991-6991m, the federal hazardous waste regulations set forth at 40 C.F.R. Parts 260-266, 268, 270-273, and 280, or the authorized State of Maryland Hazardous Waste Management Regulations (MdHWMR) set forth at the Code of Maryland Regulations (COMAR), Title 26, Subtitles 10 and 13 *et seq.*

Sections 3008(a) and 9006 of RCRA, 42 U.S.C. §§ 6928(a) and 6991e authorize EPA to take enforcement action whenever it is determined that a person is in violation of any requirement of RCRA Subtitles C and I, EPA's regulations thereunder, or any regulation of a state hazardous waste or underground storage tank program which has been authorized by EPA. Sections 3008(g) and 9006(d) of RCRA, 42 U.S.C. §§ 6928(g) and 6991e(d) authorize the assessment of a civil penalty against any person who violates any requirement of Subtitle C and I of RCRA, respectively.

On February 11, 1985, pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b) and 40 C.F.R. Part 271, Subpart A, the State of Maryland was granted final authorization to administer its hazardous waste management program set forth at the COMAR, Title 10, Subtitle 51 *et seq.* in lieu of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939e. Through this final authorization, the provisions of



Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.  
Customer Service Hotline: 1-800-438-2474

MdHWMR (Original Authorized Program) became requirements of RCRA Subtitle C and are, accordingly, enforceable by EPA on and after that date pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a). A revised Maryland hazardous waste management program set forth at COMAR, Title 26, Subtitle 13 (Revised Authorized Program) was authorized by EPA on July 31, 2001, and accordingly, the provisions of the Revised Authorized program are enforceable by EPA on and after that date pursuant to Section 3008(a) of RCRA, 42 U.S.C. § 6928(a).

Effective July 30, 1992, pursuant to Section 9004 of RCRA, 42 U.S.C. § 6991c, and 40 C.F.R. Part 281, Subpart A, the State of Maryland was granted final authorization to administer a state underground storage tank management program *in lieu* of the Federal underground storage tank management program established under Subtitle I of RCRA, 42 U.S.C. §§ 6991-6991i. The provisions of the Maryland underground storage tank management program, through this final authorization, have become requirements of Subtitle I of RCRA and are, accordingly, enforceable by EPA pursuant to Section 9006 of RCRA, 42 U.S.C. § 6991e. Maryland's authorized underground storage tank program regulations are administered by the Maryland Department of the Environment (MDE), and are set forth in COMAR Title 26, Subtitle 10.

Based upon the information currently available to EPA, EPA believes that there is a sufficient basis for the issuance of an Administrative Complaint seeking assessment of a civil penalty and a Compliance Order requiring BARC to comply with RCRA. Prior to issuing an Administrative Complaint, EPA is providing BARC the opportunity to confer with EPA to show cause as to any reasons why an Administrative Complaint should not be issued for the violations identified below. EPA is also inviting BARC to meet with EPA to discuss the possibility of entering into a settlement of the violations with the Agency without litigation.

EPA has identified the following possible RCRA violations at the Facility:

1. **Operation without a permit or interim status.** BARC violated Section 3005(a) and (e) of RCRA, 42 U.S.C. § 6925(a) and (e) and COMAR 26.13.03.05, by operating a hazardous waste storage facility without a permit or qualifying for an exemption to the permit requirement. Although BARC apparently attempted to comply with the generator accumulation exemption to the permit requirement, found in COMAR 26.13.03.05, BARC did not qualify for this exemption because of its failure to comply with all of the conditions for this exemption, including but not limited to: BARC failed to label containers used for satellite accumulation of hazardous waste with the words "Hazardous Waste"; failed to provide hazardous waste training to employees responsible for handling hazardous waste; failed to maintain documentation stating the amount of introductory and continuing training that is required for employees managing hazardous waste; and, failed to manage containers of hazardous waste as required under the rule. In addition to violating the permit requirement, many of the acts or omissions which caused BARC to fail to comply with the conditions for temporary accumulation are themselves independent violations of the hazardous waste requirements.

2. **Failure to provide training.** BARC violated COMAR 26.13.05.02G *et seq.* (40 C.F.R. § 264.16 *et seq.*) as follows:

- A. BARC violated COMAR 26.13.05.02G(1) (40 C.F.R. § 264.16(a)) by failing to provide hazardous waste training to employees responsible for handling hazardous waste.
- B. BARC violated COMAR 26.13.05.02G(4)(c) by failing to maintain documentation stating the amount of introductory and continuing training that is required for employees managing hazardous waste.

3. **Failure to make waste determinations.** COMAR 26.13.03.02 (40 C.F.R. § 262.11) provides that a person who generates a solid waste must determine if that waste is a hazardous waste using the methods set forth therein. BARC generated "solid waste," at its Facility as that term is defined by COMAR 26.13.02.02, RCRA Section 1004(27), 42 U.S.C. § 6903(27), and 40 C.F.R. §§ 260.10, 261.2. BARC is also a "generator" as that term is defined by COMAR 26.13.01.03.B (29)(40 C.F.R. § 260.10). BARC failed to make waste determinations before disposing waste aerosol cans in the municipal waste stream, in violation of COMAR 26.13.03.02 (40 C.F.R. § 262.11).

4. **Failure to Manage Containers.** With exceptions not applicable here, where a container holding hazardous waste is not in good condition, COMAR 26.13.05.09(B) (40 C.F.R. § 265.71) requires the transfer of hazardous waste being stored in a container in poor condition to a container that is suitable for storage of the hazardous waste. BARC failed to transfer hazardous waste from a leaking container to a suitable container, in violation of COMAR 26.13.05.09(b).

5. **Failure to Conduct Release Detection on Underground Storage Tanks ("USTS").** COMAR 26.10.05.02B (40 C.F.R. § 280.41(a)) provides, with exceptions not relevant here, that owners and operators of petroleum USTs monitor each UST for releases at least every thirty (30) days using one of the methods described in COMAR § 26.10.05.04.E - I, with exceptions not relevant to this matter. BARC failed to perform release detection on nine USTs at four separate buildings during a five-year period.

6. **Failure to Perform Annual Automatic Line Leak Detector Testing.** COMAR 26.10.05.05B (40 C.F.R. 280.44(a)) requires an annual test on automatic line leak detectors in accordance with the manufacturer's requirement. By letter dated November 9, 2007, BARC confirmed that the automatic line leak detectors for Tank 3 at Building 445 and for both tanks at Building 166 had never had an annual test as required by COMAR § 26.10.05.05B.

7. **Failure to Conduct Line Tightness Testing.** COMAR § 26.10.05.02C(2)(b) (40 C.F.R. § 280.41(b)(1)(ii)) requires that pressurized piping have an annual line tightness test conducted in accordance with COMAR 26.10.05.05C or have monthly monitoring conducted in accordance with COMAR 26.10.05.05D. In its November 9, 2007 response to EPA's June 29, 2007

Information request letter, BARC confirmed that no method of tightness testing had been performed on the pressurized piping associated with Tank 3 at Building 445. In addition, BARC could not provide documentation for line leak detection for the piping associated with Tank 2 at Building 166.

8. **Failure to Provide Overfill Protection.** COMAR § 26.10.03.01D(1)(b)(40 C.F.R. § 280.20(c)(1)(ii)) requires, with exceptions not relevant here, all owners and operators to use overfill prevention equipment that automatically shuts off flow into the tank when the tank is no more than 95 percent full, or alerts the transfer operator when the tank is no more than 90 percent full by restricting the flow into the tank or triggering a high level alarm. BARC could not document overfill protection for the USTs at Building 166, and USTs Nos. 1 and 3 at Building 445.

If BARC would like to take advantage of the opportunity to discuss this matter with EPA prior to the filing of an Administrative Complaint, EPA requests that BARC contact the Agency within fourteen (14) calendar days after BARC's receipt of this letter to set up a meeting to discuss these issues. If you wish to discuss this matter, please contact Joyce A. Howell, Senior Assistant Regional Counsel, at (215) 814-2644.

Please be advised, however, that EPA may issue an Administrative Complaint and Compliance Order and Notice of Right to a Hearing at any time after thirty days of the issuance of this Request to Show Cause, unless an agreement in principle is reached or BARC provides information to EPA showing that violations have not occurred.

If BARC submits information to EPA relevant to the above-referenced alleged violations, please note that BARC is entitled to assert a claim of business confidentiality covering any part or all of the submitted information in the manner described in 40 C.F.R. § 2.203(b); however, such claims may be required to be substantiated. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the information is submitted, EPA Region III may make such information available to the public without further notice to BARC.

To the extent that there are ongoing violations at the Facility, these violations should be corrected immediately. EPA specifically reserves the right to use any and all enforcement tools at its disposal to address past and/or ongoing violations at the Facility, including, but not limited to, the imposition of civil penalties.

If BARC has any other questions concerning this matter, it may contact Ms. Stacie Peterson at (215) 814-5173, or Ms. Melissa Toffel at (215) 814-2060, or it may contact the attorney assigned to this matter, Ms. Howell, at (215) 814-2644.

Sincerely,



Carol Amend, Chief  
RCRA Compliance & Enforcement Branch  
Waste & Chemicals Management Division

cc: Stacie Peterson (EPA)  
Melissa Toffel (EPA)  
Joyce Howell (EPA)  
Herb Meade (Maryland Department of the Environment)  
Rick Johnson (Maryland Department of the Environment)  
Christian Obineme (BARC)  
David Prevar (BARC)

**1 From** Please print and print hard  
 Date 2/9/05 Sender's FedEx Account Number 1509-0196-0  
 Sender's Name Joyce Hamill Phone (215) 814-5713

Company EPA 3WG31

Address 1650 ARCH ST

City PHILADELPHIA State PA ZIP 19103-2029

**2 Your Internal Billing Reference** OPTIONAL

**3 To**  
 Recipient's Name Rick Johnson Phone (410) 537 3400

Company MDE - O.I. Control Program

Recipient's Address Montgomery Park Business Ctr.

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address 1900 Washington Blvd

To request a package be held at a specific FedEx location, print FedEx address here.

City Baltimore State MD ZIP 21230

0373980598



**4a Express Package Service**

☒ **FedEx Priority Overnight**  
 Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ **FedEx Standard Overnight**  
 Next business afternoon. Saturday Delivery NOT available.  
☐ **FedEx First Overnight**  
 Earliest next business delivery to select Saturday Delivery.  
☐ **FedEx 2Day**  
 Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ **FedEx Express Saver**  
 Third business day. Saturday Delivery NOT available.  
 FedEx Envelope rate not available. Minimum charge: One-pound rate.

**4b Express Freight Service**

☐ **FedEx 1Day Freight**  
 Next business day. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ **FedEx 2Day Freight**  
 Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ **FedEx 3Day Freight**  
 Third business day. Saturday Delivery NOT available.

\* Call for Confirmation. \*\* To us

**5 Packaging**

☒ **FedEx Envelope** ☐ **FedEx Pak**  
 Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.  
☐ **FedEx Box** ☐ **FedEx Tube**  
 \* Declared value

**6 Special Handling**

☐ **SATURDAY Delivery**  
 NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 2Day Freight.  
☐ **HOLD Weekday**  
 at FedEx Location NOT Available for FedEx First Overnight.  
☐ **HOLD Saturday**  
 at FedEx Location Available ONLY for FedEx Priority Overnight, FedEx 2Day to select loc.  
 Does this shipment contain dangerous goods?  
 One box must be checked.  
☐ **No** ☐ **Yes**  
 Is your attached Shipper's Declaration required?  
☐ **Yes** ☐ **No**  
 Dry Ice Dry Ice, 6, UN 1845  
 Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.  
☐ **Cargo Aircraft Only**

**7 Payment**

Bill to: Enter FedEx Acct. No. or Credit Card No. below.  
☒ **Sender** ☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash**  
 FedEx Acct. No. in Section 1 will be billed.

FedEx Acct. No. Exp. Date

Total Packages Total Weight Total Declared Value  
 \$ .00

\* Our liability is limited to \$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

**8 Residential Delivery Signature Options**

If you require a signature, check Direct or Indirect.  
☐ **No Signature Required**  
 Packages may be left without obtaining a signature for delivery.  
☐ **Direct Signature**  
 Someone at recipient's address may sign for delivery. Fee applies.  
☐ **Indirect Signature**  
 If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.

519

**1 From** Please print and press hard  
 Date 2/4/08 Sender's FedEx Account Number 1509-0196-0  
 Sender Name Jayce Harrell Phone (215) 814-5713  
 Company EPA 3WC31

Address 1650 ARCH ST  
 City PHILADELPHIA State PA ZIP 19103-2029

**2 Your Internal Billing Reference**  
 First 24 characters will appear on invoice. OPTIONAL

**3 To**  
 Recipient's Name Herb Meade Phone (410) 537-3386  
 Company MDE - Administrative Oil Control P.  
 Recipient's Address Montgomery Park Business Ctr  
 We cannot deliver to P.O. boxes or P.O. ZIP codes.  
 Address 1800 Washington Blvd. Suite 620  
 To request a package be held at a specific FedEx location, print FedEx address here.  
 City Baltimore State MD ZIP 21230

0373980598

**4a Express Package Service**

☒ FedEx Priority Overnight  
 Next business morning. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx Standard Overnight  
 Next business afternoon. Saturday Delivery NOT available.  
☐ FedEx First Overnight  
 Earliest next business morning delivery to select locations. Saturday Delivery NOT available.  
☐ FedEx 2Day  
 Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx Express Saver  
 Third business day. Saturday Delivery NOT available.  
 \* To select location

**4b Express Freight Service**

☐ FedEx 1Day Freight\*  
 Next business day. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx 2Day Freight  
 Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx 3Day Freight  
 Third business day. Saturday Delivery NOT available.  
 \* Call for Confirmation. \*\* To select location

**5 Packaging**

☒ FedEx Envelope\*  
☐ FedEx Pak\*  
 Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.  
☐ FedEx Box  
☐ FedEx Tube  
☐ Other  
 \* Declared value limit \$500

**6 Special Handling**

☐ SATURDAY Delivery  
 NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 2Day Freight.  
☐ HOLD Weekday at FedEx Location  
 NOT Available for FedEx First Overnight.  
☐ HOLD Saturday at FedEx Location  
 Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.  
 Does this shipment contain dangerous goods?  
☒ No ☐ Yes  
 One box must be checked. As per attached Shipper's Declaration. ☐ Yes  
 Shipper's Declaration not required. ☐ Dry Ice  
 Dry Ice, I, UN 1845 ☐ Cargo Aircraft Only  
 Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

**7 Payment**

Bill to: Enter FedEx Acct. No. or Credit Card No. below.  
☒ Sender  
 FedEx Acct. No. Credit Card No. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check  
 I will be billed.

Total Packages Total Weight Total Declared Value\*  
 \$ .00

\*Our liability is limited to \$500 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

**8 Residential Delivery Signature Options**

If you require a signature, check Direct or Indirect.  
☐ No Signature Required  
 Package may be left without obtaining a signature for delivery.  
☐ Direct Signature  
 Someone at recipient's address may sign for delivery. Fee applies.  
☐ Indirect Signature  
 If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.

519



© 2008 FedEx Corporation. All rights reserved. FedEx and the FedEx logo are trademarks of FedEx Corporation. All other trademarks are the property of their respective owners.

**1 From** Please print and print hard.  
**Date** 2/4/88  
**Sender's FedEx Account Number** 1509-0196-0  
**Sender's Name** Joyce Hurrell  
**Phone** (215) 814-5713  
**Company** EPA  
**Address** 1650 ARCH ST  
**City** PHILADELPHIA **State** PA **ZIP** 19103-2029

**2 Your Internal Billing Reference** OPTIONAL

**3 To**  
**Recipient's Name** David Prevan  
**Phone** (304) 696-8223  
**Company** USDA, Ag Research Serv.  
**Recipient's Address** Building 033, BARC West  
**We cannot deliver to P.O. boxes or P.O. ZIP codes.**  
**Address** 10300 Baltimore Ave  
**To request a package be held at a specific FedEx location, print FedEx address here.**  
**City** Beltsville **State** MD **ZIP** 20705

0373980598



**4a Express Package Service**  
☐ **FedEx Priority Overnight**  
 Shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ **FedEx Standard Overnight**  
 Next business afternoon. Saturday Delivery NOT available.  
☐ **FedEx 2Day**  
 Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ **FedEx Express Saver**  
 Third business day. Saturday Delivery NOT available.  
 FedEx Envelope rate not available. Minimum charge One-pound rate.

**4b Express Freight Service**  
☐ **FedEx 10Day Freight**  
 Next business day. Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ **FedEx 2Day Freight**  
 Second business day. Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
 \* Call for Confirmation.

**5 Packaging**  
☒ **FedEx Envelope\***  
☐ **FedEx Pak\***  
 Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.  
☐ **FedEx Box**  
☐ **FedEx Tube**  
 \* Declared value

**6 Special Handling** Include FedEx address in Section 3.  
☐ **SATURDAY Delivery**  
 NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 2Day Freight.  
☐ **HOLD Weekday at FedEx Location**  
 NOT Available for FedEx First Overnight.  
☐ **HOLD Saturday at FedEx Location**  
 Available ONLY for FedEx Priority Overnight, FedEx 2Day to select loc.  
 Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.  
☒ **No** ☐ **Yes** (See attached Shipper's Declaration)  
☐ **Yes** (Shipper's Declaration not required)  
☐ **Dry Ice**  
 Dry Ice, ICA 1000  
☐ **Cargo Aircraft Only**

**7 Payment** Bill to:  
☒ **Sender** (Acct. No. in Section 1 will be billed)  
☐ **Recipient** ☐ **Third Party** ☐ **Credit Card** ☐ **Cash**

FedEx Acct. No. or Credit Card No. Exp. Date  
 Total Packages Total Weight Total Declared Value\*  
 \$ .00

\* Our liability is limited to \$500 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

**8 Residential Delivery Signature Options** If you require a signature, check Direct or Indirect.  
☐ **No Signature Required**  
 Packages may be left without obtaining a signature.  
☐ **Direct Signature**  
 Someone at recipient's address may sign for delivery. Fee applies.  
☐ **Indirect Signature**  
 If no one is available at recipient's address, someone at a neighboring address may sign the delivery. Fee applies.

519



**1 From** Please print and print hard.

Date 2/4/2008 Sender's FedEx Account Number 1509-0196-0

Sender's Name Joyce Howell Phone (215) 814-5713

Company EPA 3W031

Address 1650 ARCH ST

City PHILADELPHIA State PA ZIP 19103-2029

**2 Your Internal Billing Reference** OPTIONAL

**3 To**

Recipient's Name Phyllis E. Johnson Phone 301 504 6078

Company Bethsville Ag. Research Center

Recipient's Address USDA BLDG 003/RM 223 BACC WEST

We cannot deliver to P.O. boxes or P.O. ZIP codes.

Address 10300 Baltimore Blvd

To request a package be held at a specific FedEx location, print FedEx address here.

City Bethsv. 11e State MD ZIP 20705

0373980598

**4a Express Package Service**

☒ FedEx Priority Overnight  
Next business morning.\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx Standard Overnight  
Next business afternoon.\* Saturday Delivery NOT available.

☐ FedEx First Overnight  
Earliest next business morning delivery to select locations. Saturday Delivery NOT available.

☐ FedEx 2Day  
Second business day.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected. FedEx Envelope rate not available. Minimum charge One-pound rate.

☐ FedEx Express Saver  
Third business day.\* Saturday Delivery NOT available.

\* To meet locations

**4b Express Freight Service**

☐ FedEx 1Day Freight®  
Next business day.\* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx 2Day Freight  
Second business day.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

☐ FedEx 3Day Freight  
Third business day.\* Saturday Delivery NOT available.

\* To meet locations

**5 Packaging**

☒ FedEx Envelope® ☐ FedEx Pak® Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak. ☐ FedEx Box ☐ FedEx Tube ☐ Other

\* Declared value limit \$500.

**6 Special Handling**

Include FedEx address in Section 3.

☐ SATURDAY Delivery  
NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 2Day Freight.

☐ HOLD Weekday at FedEx Location  
NOT Available for FedEx First Overnight.

☐ HOLD Saturday at FedEx Location  
Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods?  
One box must be checked.

☐ No ☐ Yes As per attached Shipper's Declaration ☐ Yes Shipper's Declaration not required ☐ Dry Ice Dry Ice, 6 UN 1845 ☐ Cargo Aircraft Only

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

**7 Payment**

Bill to: Enter FedEx Acct. No. or Credit Card No. below.

☒ Sender Acct. No. in Section 1 will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/Check

FedEx Acct. No. Credit Card No. Exp. Date

Total Packages	Total Weight	Total Declared Value*
		\$ .00

\*Our liability is limited to \$500 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

**8 Residential Delivery Signature Options**

If you require a signature, check Direct or Indirect.

☐ No Signature Required  
Package may be left without obtaining a signature.

☐ Direct Signature  
Someone at recipient's address may sign for delivery. Fee applies.

☐ Indirect Signature  
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.

519



**FedEx.com**  
Track your package online. Activate all the tools you need.

1 **FROM** Please print and sign here.  
Date 2/9/2018 Sender's FedEx Account Number 1509-0196-0  
Sender's Name Jayre Hamell Phone (215) 814-5713  
Company EPA 3W031  
Address 1650 ARCH ST

City PHILADELPHIA State PA ZIP 19103-2029

2 **Your Internal Billing Reference** OPTIONAL  
First 24 characters will appear on invoice.

3 **To**  
Recipient's Name Christian Obineme Phone 301.504.7434  
Company USDA F/S Bldg 426A BARC  
Recipient's Address BARC EAST ROOM 1  
We cannot deliver to P.O. boxes or P.O. ZIP codes.  
Address 10300 Baltimore Ave  
To request a package be held at a specific FedEx location, print FedEx address here.  
City Beltville State MD ZIP 20705

0373980598

**4a Express Package Service**

☒ FedEx Priority Overnight Next business morning. \* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx Standard Overnight Next business afternoon. \* Saturday Delivery NOT available.  
☐ FedEx First Overnight Earliest next business delivery to select local Saturday Delivery NOT available.  
☐ FedEx 2Day Second business day. \* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx Express Saver Third business day. \* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
\* To meet  
FedEx Envelope rate not available. Minimum charge: One-pound rate.

**4b Express Freight Service**

☐ FedEx 1Day Freight\* Next business day. \* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx 2Day Freight Second business day. \* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
☐ FedEx 3Day Freight Third business day. \* Saturday Delivery NOT available.  
\* To meet

\* Call for Confirmation

**5 Packaging**

☐ FedEx Envelope\* ☐ FedEx Pak\* Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak. ☐ FedEx Box ☐ FedEx Tube  
\* Declared value

**6 Special Handling**

Include FedEx address in Section 3.  
☐ SATURDAY Delivery NOT Available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 2Day Freight.  
☐ HOLD Weekday at FedEx Location NOT Available for FedEx First Overnight.  
☐ HOLD Saturday at FedEx Location Available ONLY for FedEx Priority Overnight, FedEx 2Day to select local.  
Does this shipment contain dangerous goods?  
One box must be checked.  
☐ No ☐ Yes ☐ Yes ☐ Dry Ice  
Dangerous goods (including dry ice) cannot be shipped in FedEx packaging. ☐ Cargo Aircraft Only

**7 Payment**

Enter FedEx Acct. No. or Credit Card No. below.  
☒ Sender Acct. No. in Section 1 will be billed. ☐ Recipient ☐ Third Party ☐ Credit Card ☐ Cash/

FedEx Acct. No. or Credit Card No. Exp. Date  
Total Packages Total Weight Total Declared Value\*  
\$ .00

\*Our liability is limited to \$100 unless you declare a higher value. See back for details. By using this Airbill you agree to the service conditions on the back of this Airbill and in the current FedEx Service Guide, including terms that limit our liability.

**8 Residential Delivery Signature Options**

If you require a signature, check Direct or Indirect.

☐ No Signature Required Package may be left without obtaining a signature.  
☐ Direct Signature Someone at recipient's address may sign for delivery. Fee applies.  
☐ Indirect Signature If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.

519

[illegible]